

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

TEAL PEAK CAPITAL, LLC;

Plaintiff and Counter Defendant,

And

JOHN MICHAEL GRZAN AND
NAMRATA KHIMANI

Counter Defendant,

v.

ALAN BRAM GOLDMAN,

Defendant.

CIVIL NO. 20-1747 (CVR)

JOINT MOTION FOR LEAVE TO FILE RESTRICTED FILING
(SELECTED PARTIES)

TO THE HONORABLE COURT:

COME NOW Plaintiff Teal Peak Capital and Defendant, by their respective counsel, and state and pray:

1. Today, the parties are submitting their *Confidential* Stipulation for Entry of Judgment, in compliance with the Court's Order at Docket No. 151, pursuant to which the Court will enter Judgment dismissing the case with prejudice.
2. Because the stipulation is confidential per the parties' agreement, the parties wish to submit it to the Court as a restricted filing, viewable only to Plaintiff and Defendant.

WHEREFORE, Plaintiff and Defendant respectfully request that they be allowed to file the Confidential Stipulation for Entry of Judgment **under seal** (as a restricted filing), viewable *only* to Plaintiff and Defendant.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE

I CERTIFY that today I have electronically filed this motion with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to all attorneys of record.

In San Juan, Puerto Rico, this 19th day of May, 2023.

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